

1 SCHIFFRIN BARROWAY TOPAZ & KESSLER, LLP

2 Alan R. Plutzik, Of Counsel (Bar No. 077785)

3 2125 Oak Grove Road, Suite 120

4 Walnut Creek, California 94598

5 Telephone: (925) 945-0770

6 Facsimile: (925) 945-8792

7 -and-

8 Stuart L. Berman

9 Sean M. Handler

10 Tammy D. Cummings

11 280 King of Prussia Road

12 Radnor, PA 19087

13 Telephone: (610) 667-7706

14 Facsimile: (610) 667-7056

15 [Proposed] Lead Counsel

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 ROSENBAUM CAPITAL LLC, Individually
19 and on Behalf of All Others Similarly Situated,

20 Plaintiff,

21 v.

22 LUMINENT MORTGAGE CAPITAL, INC.,
23 GAIP P. SENECA, SEWELL TREZEVANT
24 MOORE, JR., and CHRISTOPHER J. ZYDA,

25 Defendants.

No. 3:07-cv-04096-PJH

CLASS ACTION

NOTICE OF MOTION AND MOTION OF
RONALD LARSON TO CONSOLIDATE
ACTIONS, TO BE APPOINTED LEAD
PLAINTIFF AND FOR APPROVAL OF
LEAD PLAINTIFF'S SELECTION OF LEAD
COUNSEL

DATE: November 21, 2007

TIME: 9:00 a.m.

COURTROOM: 3

JUDGE: Hon. Phyllis J. Hamilton

26 [Captions Continued on Next Page]

27
28 NOTICE OF MOTION AND MOTION OF RONALD LARSON TO CONSOLIDATE ACTIONS, TO BE
APPOINTED LEAD PLAINTIFF AND FOR APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD
COUNSEL

CASE NO. 3:07-cv-04096-PJH

1
2 PEM RESOURCES LP, Individually and On
3 Behalf of All Others Similarly Situated,
4 Plaintiff,

5 v.

6 LUMINENT MORTGAGE CAPITAL, INC.,
7 GAIL P. SENECA, SEWELL TREZEVANT
8 MOORE, JR., and CHRISTOPHER J. ZYDA,
9 Defendants.

Case No. 3:07-cv-04184-PJH

10 HOWARD J. KAPLOWITZ IRA, Individually
11 and On Behalf of All Others Similarly
12 Situated,

13 Plaintiff,

14 v.

15 LUMINENT MORTGAGE CAPITAL, INC.,
16 S. TREZEVANT MOORE, JR. and
17 CHRISTOPHER J. ZYDA,
18 Defendants.

Case No. 3:07-CV-04140-PJH

19 ELLIOT GREENBERG, Individually and On
20 Behalf of All Others Similarly Situated,
21 Plaintiff,

22 v.

23 LUMINENT MORTGAGE CAPITAL, INC.,
24 GAIL P. SENECA, SEWELL TREZEVANT
25 MOORE, JR., and CHRISTOPHER J. ZYDA,
26 Defendants.

Case No. 3:07-cv-04141-PJH

27 ALLEN M. METZGER, On Behalf of Himself
28 and All Others Similarly Situated,
Plaintiff,

v.

LUMINENT MORTGAGE CAPITAL, INC.,
GAIL P. SENECA, SEWELL TREZEVANT
MOORE, JR., and CHRISTOPHER J. ZYDA,
Defendants.

Case No. 3:07-cv-04686-PJH

NOTICE OF MOTION AND MOTION OF RONALD LARSON TO CONSOLIDATE ACTIONS, TO BE
APPOINTED LEAD PLAINTIFF AND FOR APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD
COUNSEL
CASE NO. 3:07-cv-04096-PJH

1
2 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

3 PLEASE TAKE NOTICE that on November 21, 2007 at 9:00 a.m., or soon thereafter as the
4 matter may be heard, class member Ronald Larson ("Movant"), by his counsel, will move, and
5 hereby does move, this Court for an Order: (i) consolidating for all purposes the above-captioned
6 related actions pursuant to Fed. R. Civ. P. 42(a); (ii) appointing Ronald Larson as lead plaintiff; (iii)
7 approving Ronald Larson's selection of the law firm of Schiffrin, Barroway, Topaz & Kessler, LLP
8 to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just
9 and proper. In support of this motion, Ronald Larson submits herewith a Memorandum of Points
10 and Authorities and Declaration of Alan R. Plutzik. A proposed form of Order is also submitted
11 herewith.

12 Dated: October 9, 2007

Respectfully submitted,

13 SCHIFFRIN BARROWAY
14 TOPAZ & KESSLER, LLP

15 s/Alan R. Plutzik

16 Alan R. Plutzik, Of Counsel
17 2125 Oak Grove Blvd., Suite 120
18 Walnut Creek, CA 94598
19 Telephone: (925) 945-0770
20 Facsimile: (925) 945-8792

21 -and-

22 Stuart L. Berman
23 Sean M. Handler
24 Tammy D. Cummings
25 280 King of Prussia Road
26 Radnor, PA 19087
27 Telephone: (610) 667-7706
28 Facsimile: (610) 667-7056